

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

MATTHEW McPHERSON)	CASE NO. 1:14-cv-02475
on behalf of himself and all others)	
similarly situated,)	JUDGE SOLOMON OLIVER, JR.
)	
Plaintiff,)	
)	
v.)	
)	
HORSESHOE CLEVELAND)	DEFENDANT’S MOTION FOR
MANAGEMENT, LLC d/b/a)	ADMISSION <i>PRO HAC VICE</i> OF
HORSESHOE CASINO)	ATTORNEY JOEL M. COHN
CLEVELAND,)	
)	
Defendant.)	

Pursuant to Local Civil Rule 83.5(h), the undersigned attorney for defendant Horseshoe Cleveland Management, LLC (“Defendant”) respectfully requests that this Court permit Attorney Joel M. Cohn to appear in this case *pro hac vice* as co-counsel of record for Defendant. In support of this Motion for *pro hac vice* admission to the bar, Defendant states as follows:

1. Joel M. Cohn is a partner in the law firm of Akin Gump Strauss Hauer & Feld LLP. (The Affidavit of Joel M. Cohn in Support of Motion to Admit *Pro Hac Vice* is attached hereto as Exhibit 1.)
2. Mr. Cohn is currently counsel for Defendant.

3. Mr. Cohn is and has been a member in good standing of the Bar of the District of Columbia (Bar No. 933713) since 1977; the United States District Court for the District of Columbia since 1989 and the United States District Court for the District of Colorado since 1997.

4. Mr. Cohn is in good standing in all bars to which he has been admitted and he is not now, nor has he ever been, disbarred or suspended from practice before any court, department, bureau or commission of any State or the United States, nor has he ever received any reprimand from any such court, department, bureau or commission pertaining to conduct or fitness as a member of the bar.

5. Defendant is also represented in this action by the undersigned counsel, who is licensed to practice law (and in good standing) in Ohio and in the Northern District of Ohio.

6. Mr. Cohn's office address, phone number and email address are as follows:

Joel M. Cohn
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WHEREFORE, the undersigned counsel respectfully requests that the Court rule upon this Motion with no hearing or further response and enter an Order (a) granting this Motion and (b) admitting Joel M. Cohn to represent Defendant as co-counsel in this matter *pro hac vice*.

Respectfully submitted,

/s/ Ryan J. Morley

Ryan J. Morley (0077452)

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Attorneys for Defendant

CERTIFICATE OF SERVICE

This is to certify that the foregoing has been electronically filed with the United States District Court for the Northern District of Ohio on February 3, 2015. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Ryan J. Morley

Ryan J. Morley (0077452)

One of the Attorneys for Defendant